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September 13, 2021

Honorable Noel L. Hillman  
United States District Court of New Jersey  
Mitchell H. Cohen Building & US Courthouse  
4<sup>th</sup> & Cooper Streets, Room 1050  
Camden, NJ 08101

RE: Brown, et al. v. Warren, et al.  
Docket No. 1:20-cv-7907(NLH/KMW)

Dear Judge Hillman:

As Your Honor may recall, my law firm is legal counsel to PBA Local 231, which represents the Rank-and-File Correctional Police Officers in Cumberland County. I understand you are having some sort of a hearing on September 15, 2021, as it relates to the above-referenced matter.

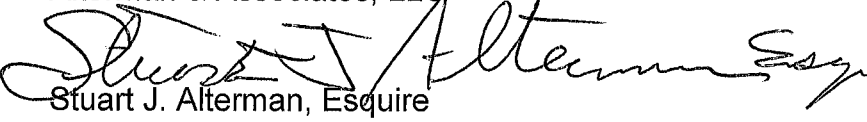
Although PBA Local 231 is not a named plaintiff, nor a named defendant, in this matter, they are certainly an interested party. We wanted to bring several things to your attention. Specifically, several Correctional Police Officers who have spoken with Special Master Hughes, or his designees, have been targeted for discipline by the Administration. We do not believe this is a coincidence. We believe it stems directly from their communication with and/or their cooperation with Special Master and his team. This includes, but is not limited to, Correctional Police Officer Donald Carter, Correctional Police Officer Kelly Butler, and Correctional Police Officer Gregory Glenn.

It is certainly unfortunate that Officers who have either testified in this matter, or have been requested to be interviewed by the Special Master, are being subjected to increased scrutiny by the Administration.

We would request that Your Honor give consideration to having the Special Master supervise any and all disciplinary actions that stem from any Correctional Police

Officer who has testified in this matter and/or has been interviewed by the Special Master or his designees.

Respectfully submitted,  
Alterman & Associates, LLC

  
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SJA:dam

cc: Jeffrey M. Pollack, Esquire  
Gregg L. Zeff, Esquire  
William J. Hughes, Jr. Special Master  
PBA Local 231 Executive Board